

## Zone 1

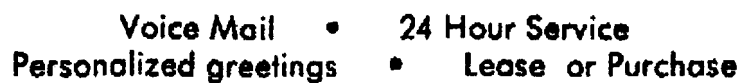


EXHIBIT D -- DECLARATION OF D. SHANE WATSON

DECLARATION OF D. SHANE WATSON

D. SHANE WATSON hereby states as follows:

I am Vice President of Danny's Two Way Communications, Inc. (Dan Comm), licensee of numerous PARS and PCP stations which Dan Comm uses to provide commercial paging service on various VHF and UHF frequencies in Cincinnati, Dayton, Springfield and Columbus, OH, and surrounding areas in Ohio, Kentucky and Indiana. I am filing this declaration in support of Dan Comm's petition to the Commission to reconsider its decision in WT Docket No. 96-18 to auction all geographic licenses for the Part 22 UHF band, regardless of the extent to which incumbent licensees already cover the areas to be included in the geographic licenses. Specifically, in this regard, Dan Comm is the licensee of PARS Stations KNKJ591 and KNKK844 and associated stations which Dan Comm utilizes to provide commercial paging services on, respectively, the frequencies 454.575 MHz and 454.425 MHz.

Dan Comm's systems on these frequencies cover substantial portions of the Cincinnati, Dayton and Columbus Economic Areas; and I have attached to this declaration a map showing the coverage of Dan Comm's existing paging systems on 454.575 MHz and 454.425 MHz. As reflected in the maps, Dan Comm's existing system on 454.575 MHz in the Cincinnati Economic Area essentially covers all of Boone, Grant and Kenton Counties in Kentucky and Hamilton, Butler and Warren Counties in Ohio, as well as substantial populated areas in adjacent counties. According to the Bureau of the Census, the estimated 1995 population just of the counties enumerated above was 1,545,138, more than 70 percent of the estimated 1995 population (2,107,168) of the Cincinnati Economic Area.

With respect to 454.425 MHz, Dan Comm's existing system in the Cincinnati Economic Area essentially covers all of Boone, Campbell and Kenton Counties in Kentucky and Hamilton, Butler and Warren Counties in Ohio, as well as substantial populated areas in adjacent counties. According to the Bureau of the Census, the estimated 1995 population just of these enumerated counties was 1,613,486, more than 75 percent of the estimated 1995 population of the Cincinnati Economic Area. Therefore, it is evident that in the Cincinnati Economic Area, no other entity could physically meet the performance standards promulgated by the Commission for geographic licensees and still provide interference protection to Dan Comm's incumbent systems on 454.575 MHz and 454.425 MHz.

Similarly, Dan Comm's existing systems on both 454.575 MHz and 454.425 MHz in the Dayton/Springfield Economic Area cover all

of Clark, Green and Montgomery Counties in Ohio, as well as substantial populated areas in adjacent counties. According to the Bureau of the Census, the estimated 1995 population just of those enumerated counties was 859,402, more than 75 percent of the estimated 1995 population (1,137,669) of the Dayton/Springfield Economic Area. Therefore, it is likewise evident that in the Dayton/Springfield Economic Area, no other entity could physically meet the performance standards promulgated by the Commission for geographic licensees and still provide interference protection to Dan Comm's incumbent systems on 454.575 MHz and 454.425 MHz.<sup>1</sup>

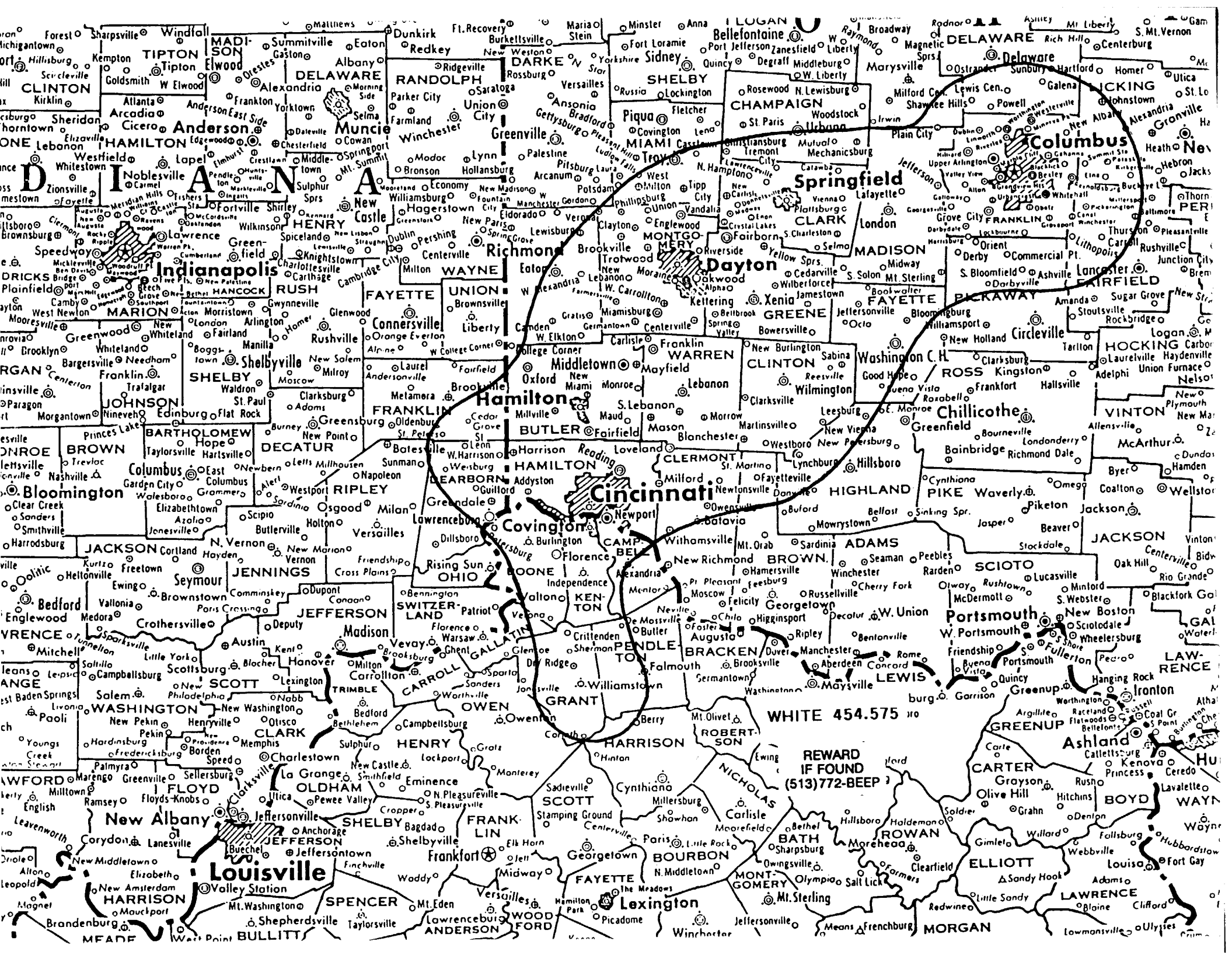
The only purpose that could possibly be served by auctioning these licenses is to cause the bidding to be artificially inflated by entities that have no hope of meeting the performance standards if they won the license. Furthermore, if they were allowed to win the bidding, Dan Comm's own expansion on these frequencies would be stifled during the five-year term of the license, which, perversely, would deny service improvements to the vast majority of the population in the licensed area. In short, absolutely no useful purpose would be served by conducting an auction for either 454.575 MHz or 454.425 MHz in either the Cincinnati or Dayton/Springfield Economic Areas, and substantial harm to the public could result from it.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10<sup>TH</sup> day of April, 1997.

  
D. Shane Watson

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<sup>1</sup> Indeed, even in the Columbus Economic Area, Dan Comm's existing systems on 454.575 MHz and 454.425 MHz both cover all of Franklin and Madison Counties in Ohio, as well as substantial populated areas in adjacent counties. The estimated 1995 population of these two counties alone was 1,051,897, which was more than 47 percent of the Columbus Economic Areas 1995 estimated population of 2,230,321. Thus, considering the geographic separation required for co-channel interference protection, it is likewise evident as a practical matter that no other entity can physically meet the performance standards promulgated by the Commission for geographic licensees.



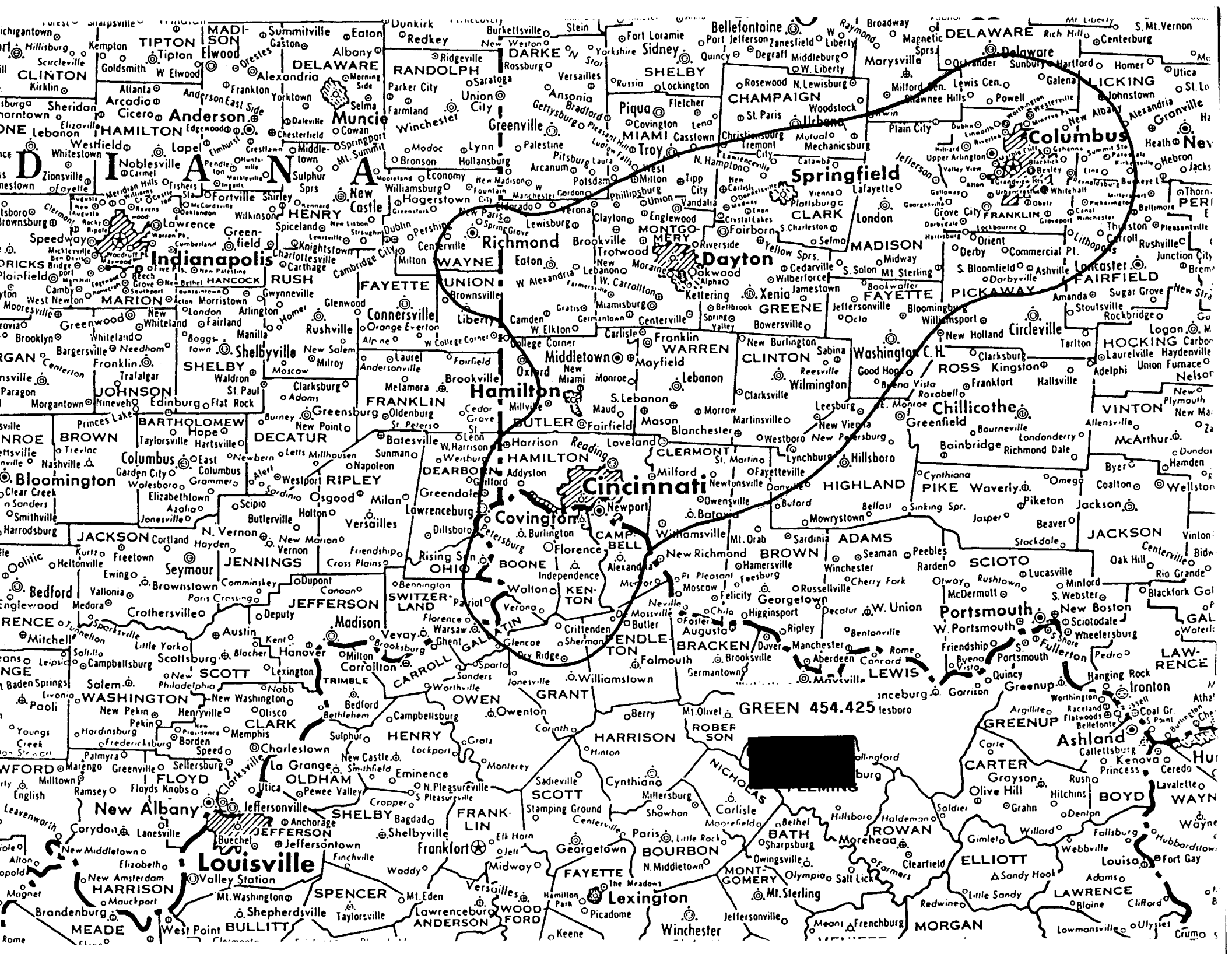


EXHIBIT E -- DECLARATION OF RAYMOND R. WINN

DECLARATION OF RAYMOND R. WINN

RAYMOND R. WINN hereby states as follows:

I am the President of Express Message Corporation (Express), licensee of PARS Station KNKO601, which Express uses to provide local commercial paging service on the frequency 931.3125 MHz in Dallas, Houston, Galveston and Beaumont/Port Arthur, TX, and surrounding areas. Through an intercarrier agreement with Advanced Paging, Inc., Express also provides regional paging service in other areas in Eastern Texas on 931.3125 MHz. I am filing this declaration in support of Express' petition to the Commission to reconsider its decision in WT Docket No. 96-18 to auction all geographic licenses for the Part 22 931 MHz band, regardless of the extent to which incumbent licensees already cover the areas to be included in the geographic licenses.

I have attached to this declaration a map showing the coverage of Express' existing paging system on 931.3125 MHz in the Dallas and Houston areas. As reflected in the map, Express' existing system in the Houston area essentially covers all of Brazoria, Fort Bend, Galveston, Harris, Jefferson, Montgomery, Orange and Wharton Counties, Texas, as well as substantial populated areas in adjacent counties. According to the Bureau of the Census, the 1990 population just of the counties enumerated above was 3,994,788, which is more than 76 percent of the 1990 census population (5,190,849) of the entire Houston Major Trading Area. Therefore, it is evident that in the Houston MTA, no other entity could physically meet the performance standards promulgated by the Commission for geographic licensees and still provide interference protection to Express incumbent system.<sup>1</sup>


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<sup>1</sup> As the map also shows, Express and Advanced Paging, Inc. already cover substantially all of Tarrant and Travis Counties in the Dallas MTA, and, when co-channel separation requirements are considered, their existing coverage essentially precludes anyone else from locating transmitters in Bastrop, Caldwell, Hays and Williamson Counties in the Austin area, or in Collin, Dallas, Denton, Ellis, Hood, Johnson, Kaufman, Parker or Rockwall Counties in the Dallas area. The 1990 census populations of all of these counties (4,760,623) is more than 49 percent of the population of the entire Dallas MTA, without even considering the fact that both carriers filed a number of additional applications in adjacent areas pursuant to the partial exemption from the current "freeze" which they expect to be operating prior to the auctions. It is thus evident that no other entity can meet the Commission's performance standards on 931.3125 MHz in the Dallas MTA.

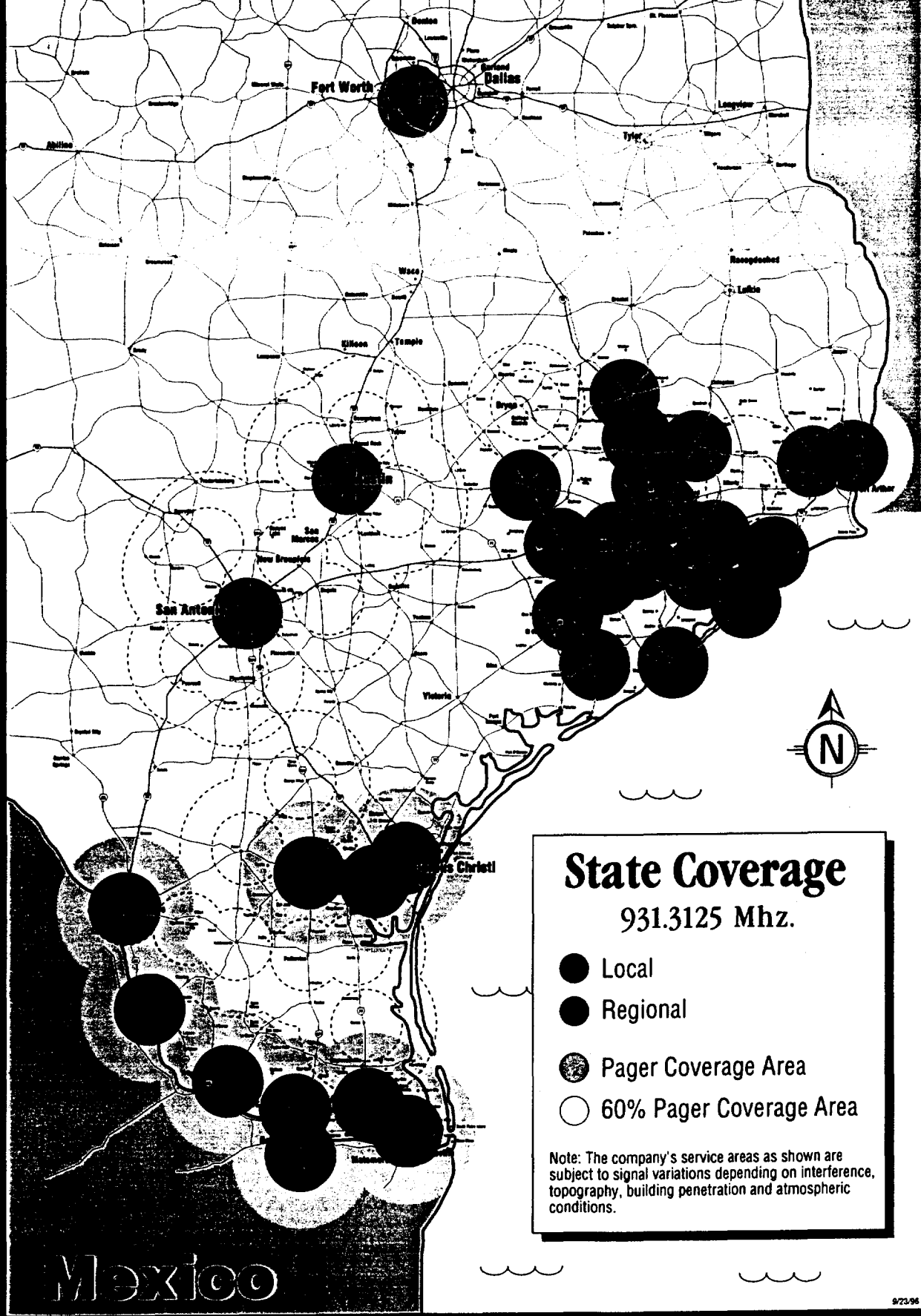


The only purpose that could possibly be served by auctioning this license is to cause the bidding to be artificially inflated by entities that have no hope of meeting the performance standards if they won the license. Furthermore, if they were allowed to win the bidding, Express' own expansion on 931.3125 MHz would be stifled during the five-year term of the license, which, perversely, would deny service improvements to the vast majority of the population in the licensed area. In short, absolutely no useful purpose would be served by conducting an auction for 931.3125 MHz in the Houston Major Trading Area, and substantial harm to the public could result from it.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 22 day of April, 1997.

  
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Raymond R. Winn

# Texas



# Mexico

EXHIBIT F -- DECLARATION OF A. V. LAUTTAMUS, II

DECLARATION OF A. V. LAUTTAMUS, II

A. V. LAUTTAMUS, II, hereby states as follows:

I am President of A. V. Lauttamus Communications, Inc., licensee of PARS Station KNKI660, which is used to provide commercial paging service on 454.625 MHz in Pittsburgh, PA, Wheeling, WV, Steubenville, OH, Weirton, WV, and surrounding areas in Ohio, Pennsylvania and West Virginia. I am filing this declaration in support of my company's petition to the Commission to reconsider its decision in WT Docket No. 96-18 to auction all geographic licenses for the Part 22 UHF band, regardless of the extent to which incumbent licensees already cover the areas to be included in the geographic licenses.

I have attached to this declaration a map showing, conservatively, the coverage of my company's existing paging system on 454.625 MHz, which extends into the Pittsburgh, Wheeling, Columbus and Cleveland Economic Areas. As reflected in the map, my company's existing system on 454.625 MHz covers the entire Wheeling Economic Area, with the single exception of a small corner of Tyler County, West Virginia; and also covers essentially all of Greene, Allegheny, Beaver and Washington Counties, PA, and Marion, Monongalia, Taylor and Harrison Counties, WV, in the Pittsburgh Economic Area, as well as substantial populated areas in adjacent counties. According to the Bureau of the Census, the estimated 1995 population just of the counties enumerated above for the Pittsburgh Economic Area was 1,969,320, which is more than 65 percent of the estimated 1995 population (3,014,987) of the Pittsburgh Economic Area. When the population of areas covered in adjacent counties is considered, there is no doubt whatsoever that my company's existing system on 454.625 MHz already covers far more than two thirds of the population of the Pittsburgh Economic Area.

Similarly, even if the entire population of Tyler County, WV (estimated in 1995 at 10,160) is excluded from consideration, my company's existing paging system on 454.625 MHz inarguably already covers more than 95 percent of the population of the entire Wheeling Economic Area. In fact, considering the geographic separation required in order to provide co-channel interference protection to my company's system, no other entity would even be able to place a base station on 454.625 MHz anywhere in the entire Wheeling Economic Area.

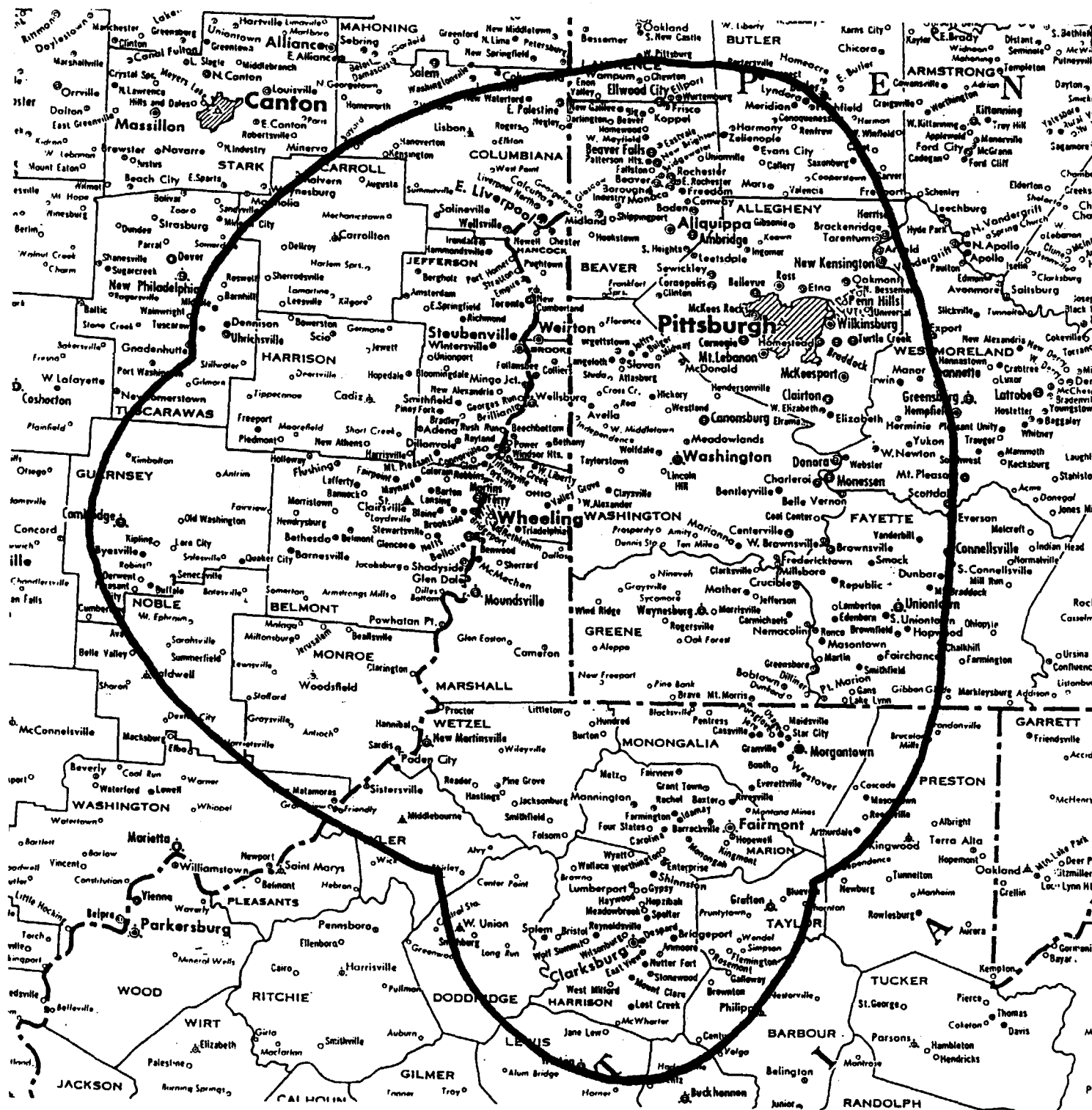
Therefore, it is evident that in both the Wheeling and the Pittsburgh Economic Areas, no other entity could physically meet the performance standards promulgated by the Commission for

geographic licensees and still provide interference protection to my company's incumbent system on 454.625 MHz.

The only purpose that could possibly be served by auctioning these geographic licenses is to cause the bidding to be artificially inflated by entities that have no hope of meeting the performance standards if they won either license. Furthermore, if they were allowed to win the bidding, my company's own expansion on 454.625 MHz would be stifled during the five-year term of the license, which, perversely, would deny service improvements to the vast majority of the population in the licensed areas. In short, absolutely no useful purpose would be served by conducting an auction for 454.625 MHz in either the Wheeling or Pittsburgh Economic Areas, and substantial harm to the public could result from it.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 8 day of April, 1997.

  
A. V. Lauttamus, II



The  
Valley's  
Choice  
in  
Paging

**TRI-STATE  
PAGING**  
West Virginia  
Pennsylvania  
& Ohio

**SERVING**  
Steubenville  
East Liverpool  
Weirton  
Wheeling  
New Martinsville  
Clarksburg  
Fairmont  
Morgantown  
and Pittsburgh

As with any radio transmission, coverage may be affected by topography and other environmental factors. In those areas along the border of coverage, reception may be diminished.

EXHIBIT G -- DECLARATION OF TED McNAUGHT

## DECLARATION OF TED McNAUGHT

TED McNAUGHT hereby states as follows:

I am President of NEP, LLC, licensee of PARS Station KNKK601, which is used to provide commercial paging service on 152.60 MHz in Portland, Augusta and Bangor, ME, and surrounding areas in Maine, New Hampshire and Massachusetts. I am filing this declaration in support of NEP's petition to the Commission to reconsider its decision in WT Docket No. 96-18 to auction all geographic licenses for the Part 22 VHF band, regardless of the extent to which incumbent licensees already cover the areas to be included in the geographic licenses.

I have attached to this declaration a map showing, conservatively, the coverage of NEP's existing paging system on 152.60 MHz, which extends into the Bangor, Portland, Boston and New York Economic Areas. As reflected in the map, NEP's existing system on 152.60 MHz covers all of Androscoggin, York, Knox, Lincoln and Cumberland Counties in the Portland Economic Area; and also covers essentially all of the populated areas of Penobscot, Washington, Kennebec and Waldo Counties in the Bangor Economic Area. According to the Bureau of the Census, the estimated 1995 population just of the counties enumerated above for the Portland Economic Area was 591,967, which is more than 80 percent of the estimated 1995 population (708,877) of the Portland Economic Area.

Similarly, the estimated 1995 population of the counties enumerated above for the Bangor Economic Area was 334,768, which is more than 60 percent of the estimated 1995 population (532,505) of the Bangor Economic Area. When the population of the areas covered by NEP in adjacent counties is considered, there is no doubt whatsoever that NEP already covers far more than two thirds of the population of the Bangor Economic Area with its existing system on 152.60 MHz.


Therefore, it is evident that in both the Portland and the Bangor Economic Areas, no other entity could physically meet the performance standards promulgated by the Commission for geographic licensees and still provide interference protection to NEP's incumbent system on 152.60 MHz.

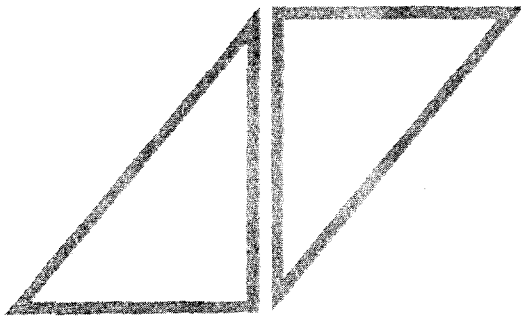
The only purpose that could possibly be served by auctioning these geographic licenses is to cause the bidding to be artificially inflated by entities that have no hope of meeting the performance standards if they won either license. Furthermore, if they were allowed to win the bidding, NEP's own expansion on



152.60 MHz would be stifled during the five-year term of the license, which, perversely, would deny service improvements to the vast majority of the population in the licensed areas. In short, absolutely no useful purpose would be served by conducting an auction for 152.60 MHz in either the Portland or Bangor Economic Areas, and substantial harm to the public could result from it.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 8th day of April, 1997.

  
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Ted McNaught

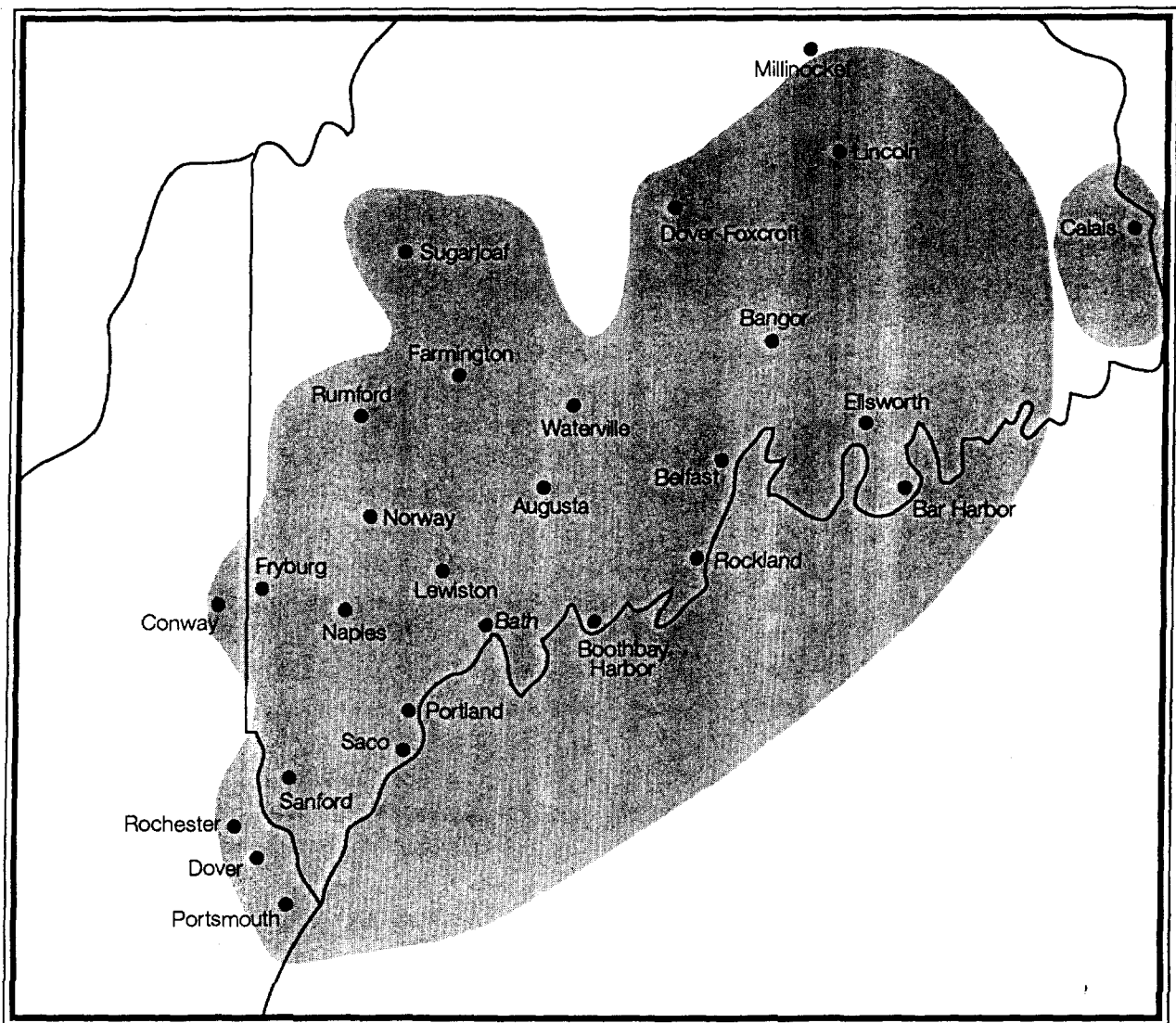


# NORTHEAST PAGING

*"The Maine Owned Paging Company"*

## Coverage Map

Channel YP



Geographic and atmospheric conditions can effect pager reception.